

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts Southern
District of Texas
FILED
04/20/2022

UNITED STATES OF AMERICA

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v.

RANDY LONG,
CARL JOHNSON,
and
MALINDA CRUZ
Defendants.

CRIMINAL NO.
JUDGE

Nathan Ochsner, Clerk of Court

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment, BRINKS, is a company engaged in the business of the secure transport of assets, including United States currency, throughout the United States and elsewhere which activities are in, and affecting interstate commerce.

COUNT ONE

**Title 18, United States Code, §§ 1951(a) and 2 – Aiding and Abetting Interference with
Commerce by Robbery**

On or about January 7, 2022, in the Houston Division of the Southern District of Texas,

CARL JOHNSON

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and

commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did attempt to unlawfully take and obtain the property of BRINKS while it was located at 10753 North Freeway Houston, Harris County, which was in the possession and custody of BRINKS, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT TWO

Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of
Violence

On or about January 7, 2022, in the Houston Division of the Southern District of Texas,

CARL JOHNSON

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did knowingly brandish a firearm, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery as alleged in Count One.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii), (3)(A), and 2.

COUNT THREE

Title 18, United States Code, §§ 1951(a) and 2 – Aiding and Abetting Interference with
Commerce by Robbery

On or about March 23, 2022, in the Houston Division of the Southern District of Texas,

**RANDY LONG,
CARL JOHNSON,
AND
MALINDA CRUZ**

defendants herein, aiding and abetting others known and unknown to the Grand Jury, did knowingly and intentionally attempt to obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did attempt to unlawfully take and obtain the property of BRINKS while it was located at 855 FM 1960 Road West Houston, Harris County, Texas, which was in the possession and custody of BRINKS, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT FOUR

Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Discharging of a Firearm During and in Relation to a Crime of
Violence

On or about March 23, 2022, in the Houston Division of the Southern District of Texas,

**RANDY LONG
AND
CARL JOHNSON**

defendants herein, aiding and abetting others known and unknown to the Grand Jury, did knowingly discharge, a firearm, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery as alleged in Count 3.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(iii), (3)(A), and 2.

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice that the firearm(s), involved in violation of Title 18, United States Code, Section 1951(a) and 924(c)(1)(A) as charged in Count One and Two, are subject to forfeiture, including, but not limited to, the following:

1. Springfield XD, serial number BA294850
2. AR Pistol, identified as a Radical Firearms, LLC RF-15, serial number 21-030858.

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

JENNIFER B. LOWERY
United States Attorney

BY: Jill Jenkins Stotts
Jill Jenkins Stotts
Assistant United States Attorney